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July 14, 2023

VIA ECF

The Honorable Michael A. Hammer
United States District Court
Martin Luther King Jr. Federal Building & U.S. Courthouse
50 Walnut Street, Room 2C
Newark, NJ 07102

Re: *United States v. Silviu Catalin Balaci*, Case No. 19-cr-877-CCC

Dear Judge Hammer:

Please accept this letter in lieu of a more formal motion on behalf of defendant Silviu Balaci. Mr. Balaci's current bail conditions, imposed on July 21, 2020, following his guilty plea on July 9, 2020, require, among other things, that he reside and remain in Germany. Mr. Balaci has fully complied with his bail conditions to date. We respectfully request, with no objection from the government or Pretrial Services, to modify Mr. Balaci's bail conditions to allow him to travel to Romania from August 6, 2023, through August 27, 2023, on an itinerary to be provided in advance to Pretrial Services. The purposes of the travel are for Mr. Balaci to renew his Romanian passport, to conduct business meetings, and to have his young children spend time with his parents (their grandparents).

As noted, neither the government nor Pretrial Services objects to this request. Thank you for the Court's attention to this matter.

Respectfully submitted,
/s/ Robert J. Anello
Robert J. Anello

cc: Assistant United States Attorney Anthony Torntore (via ECF and email)
U.S. Pretrial Services Officer Vincent Imbrosciano (via email)